

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

MOBILE NETWORKING SOLUTIONS, LLC,

Plaintiff,

vs.

E*TRADE FINANCIAL HOLDINGS, LLC,

Defendant.

CASE NO. 1:21-cv-00947-ELR

JURY TRIAL DEMANDED

**UNOPPOSED MOTION FOR EXTENSION OF TIME
TO RESPOND TO THE COMPLAINT**

On behalf of Defendant E*Trade Financial Holdings, LLC (“Defendant”), Plaintiff files this Unopposed Motion to Extend Defendant’s Time to Respond to the Complaint pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, showing the Court as follows:

1. On March 5, 2021 Plaintiff Mobile Networking Solutions, LLC (“Plaintiff”) filed this action, asserting infringement of U.S. Patent Nos. 7,543,177 and 7,958,388 (the “Asserted Patents”).
2. On March 19, 2021, Defendant was served with the summons and complaint.
3. The deadline to answer or otherwise respond to the Complaint is

currently April 9, 2021.

4. Defendant believes that Plaintiff's allegations implicate multiple issues of patent law, including infringement, invalidity, and enforceability.

5. To fully evaluate the allegations, and prepare responsive pleadings, Defendant has requested and Plaintiff has agreed to extend the deadline for defendant to answer, move, or otherwise respond to Plaintiff's Complaint by 30 days until May 10, 2021.

6. The case is still in its early stages and the requested extension, which is sought in good faith, will not appreciably delay the resolution of this matter. This is the first request for an extension of time to answer, move, or otherwise respond in this matter by Defendant, there is no scheduling order in this matter, and the extension of time requested herein will not affect any other scheduled dates.

WHEREFORE, Defendant E*Trade Financial Holdings, LLC respectfully requests that the Court grant this Unopposed Motion for Extension of Time. A Proposed Order is attached hereto for the Court's consideration.

Dated: April 8, 2021

/s/ Daniel A. Kent

Daniel A. Kent

dankent@kentrisley.com

Tel: (404) 585-4214

Fax: (404) 829-2412

Stephen R. Risley

steverisley@kentrisley.com

Tel: (404) 585-2101

Fax: (404) 389-9402

KENT & RISLEY LLC

5755 N Point Pkwy Ste 57

Alpharetta, GA 30022

Cabrach J. Connor

Texas Bar No. 24036390 (*pro hac vice* pending)

cab@connorkudlaclee.com

Kevin S. Kudlac

Georgia Bar No. 429946

kevin@connorkudlaclee.com

CONNOR KUDLAC LEE PLLC

609 Castle Ridge Road, Suite 450

Austin, TX 78746

Telephone: 512.777.1254

Facsimile: 888.387.1134

Attorneys for Plaintiff

Mobile Networking Solutions, LLC

**NORTHERN DISTRICT OF GEORGIA
LOCAL RULES 5.1(C) CERTIFICATION**

By signature below, counsel certifies that the foregoing document was prepared in Times New Roman, 14-point font in compliance with Local Rule 5.1(C).

This 7th day of April, 2021.

By: /s/ Daniel A. Kent
Daniel A. Kent